

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NEW YORK**

CONSUMER FINANCIAL PROTECTION  
BUREAU, *et al.*,

Plaintiffs,

v.

STRATFS, LLC (f/k/a STRATEGIC  
FINANCIAL SOLUTIONS, LLC), *et al.*,

Defendants, and

STRATEGIC ESOP, *et al.*,

Relief Defendants.

**CASE NO. 24-cv-40 EAW-MJR**

**MOTION FOR EXTENSION OF  
TIME TO RESPOND TO  
DEFENDANTS' CROSS-MOTION  
REQUESTING AN ORDER  
DIRECTING PLAINTIFFS AND  
THE RECEIVER TO TAKE  
CERTAIN ACTIONS**

Plaintiff the Consumer Financial Protection Bureau (CFPB) respectfully submits this motion requesting an extension of time to respond to the Opposition to the Motion to Set Aside the Preliminary Injunction and Cross-Motion filed on December 19, 2024 by Ryan Sasson, Daniel Blumkin, Albert Ian Behar, Twist Financial, LLC, Duke Enterprises, LLC, and Blaise Investments, LLC (Cross-Motion Defendants). Dkt. 533. Plaintiffs' response is currently due on February 14, 2025, and Plaintiff CFPB respectfully requests an extension until February 28, 2025. On February 6, 2025 Plaintiff CFPB requested Cross-Motion Defendants' position on an extension but has not received a response.

DATED: February 12, 2025

Respectfully submitted,

Attorneys for Plaintiff  
Consumer Financial Protection Bureau

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